

**OCEANA**Protecting The
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Country of Origin Labeling Program
Room 2092-S
Agricultural Marketing Service (AMS)
U.S. Department of Agriculture
STOP 0249
1400 Independence Avenue, SW
Washington, DC 20250-0249
Facsimile: 202-720-3499

Email to: cool@usda.com; Subject: Docket No. LS-03-04

To whom it may concern:

Sustainable salmon fisheries provide critical jobs and food for Americans throughout the Pacific. There is no substitute for healthy wild Pacific salmon—whether fresh, frozen, smoked, canned, or pouched. As such, we are very concerned about your arbitrary decision to exclude processed cooked seafood like canned, pouched and smoked salmon from labeling requirements. Did the Congress intend you to exclude the majority of salmon products from labeling?

Labeling fish for origin and farmed/wild allows consumers to make informed choices about their seafood selections. There are many well documented problems with salmon farms and risks associated with farmed fish. For example, salmon farms are a source of pollution and allow for foreign invasive Atlantic salmon to escape into Pacific waters posing disease risks, competition for wild stocks and serious genetic questions with long term consequences. Sustainable wild salmon are keystones of the Pacific ecosystem. Farmed salmon pose tremendous risks to Pacific salmon stocks.

The pellet-fed farmed fish are injected with dye to turn their gray flesh orange, and in some cases contain unsafe levels of contaminants such as PCBs. It is irresponsible to allow these salmon to be sold without adequate labeling simply because they are processed. The same fish sold fresh or frozen would be rightfully labeled "Farmed," and American consumers have a right to know what they are buying. This is one of the primary purposes of the law.

We request you support Alaska and other American fishermen as well as the commitment to sustainable oceans by requiring country of origin and wild/farmed labeling on all fish products—whether processed or not. This comprehensive labeling supports the long-term viability of our critically important salmon fisheries. If we are to have sustainable oceans, we must provide opportunities for consumers to make good choices for themselves and our ocean environment; and we must support fisheries with a proven track record of healthy, viable stocks. COOL regulations should strongly reflect the value of sustainable fisheries and oceans and require the labeling of all fish products. It would be irresponsible for you to proceed with the gaping hole of exemptions for canned, smoked and pouched salmon and likely violates your duties to the American people and the Congress.

Sincerely,

Jim Ayers
Pacific Region Director